

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WYNDHOLME VILLAGE, LLC, *et al.*, *

Plaintiffs *

v. * CIVIL ACTION NO.: 01-3809

NADIF OF WYNDHOLME, LLC, *et al.*, *

Defendants *

* * * * *

AFFIDAVIT OF HOWARD J. SCHULMAN

1. My name is Howard J. Schulman. My business address is Schulman & Kaufman, LLC, One Charles Center, Suite 600, 100 N. Charles Street, Baltimore, Maryland 21201. I am counsel to the Plaintiffs and Counter-Defendants in this case. I have personal knowledge of the matters set forth herein, to the extent not otherwise indicated. I am over 21 years of age. I am competent to testify.

2. I personally checked the website of the New York State Department of State and conducted a search for an entity by the name of Gotham-Q Venture I, LLC and found none. Thereafter, I instructed one of my staff to check with the Department of State of Delaware by telephone and was advised that it had no registration for a Gotham-Q Venture I, LLC. Delaware does not maintain an

Internet site to search for corporate or other registered business entities. On April 17, 2003, I conducted a Lexis-Nexis search of its public records for businesses nationally. This data bank, so I understand, contains the corporate and other organizational information for registrations nationwide, except for the states of Delaware, Hawaii and New Jersey. Using the search parameters “gotham-q venture” or “gotham q venture” or “gotham w/3 venture!”, I had three hits, none of which were Gotham-Q Venture I, LLC.

3. On March 10, 2003, I requested by letter to the United States District Court for the Southern District of New York copies of the indictment and docket entries in the case of *United States v. Howard Zukerman*, Case No. 2002 CR 00441. By return mail, I received copies of the docket sheet and superseding indictment of July 11, 2002, copies of which are being filed with the Court in paper form. By letter of April 15, 2003, I requested certified copies of the docket entries and the superseding indictment of November 21, 2002. I have not yet received these copies but anticipate receiving them within approximately the next week.

4. Attached to the Motion are various documents that I obtained from the official website of the Florida Department of State (<http://sunbus.org>). Among these documents are files for the following entities:

1060 Brickell Partners, LLC
Brickell Realty Investors, LLC
Inner Harbor Holdings, Inc.
NADIF of Wyndholme, LLC
One Harbor View, Inc.
Palm Realty Ventures, LLC
Plaza of Sarasota, LLC

Pursuant to 28 U.S.C., § 1746, I declare under the penalty of perjury that the
above is true and correct.

Date: _____

Howard J. Schulman